

April 6, 2018

Letter of Appeal
Mrs. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**In the Matter of: Petition for Waiver of
FCC Form 471 Filing Deadline for Funding Year 2017**

CC Docket No. 02-6

Appellant Name: David Gornstein
Appellant CRN: 16082747
Applicant: Cochrane-Fountain City School District
BEN: 143153
Form 471 #s: 181042088 Filed 3/28/18; 181042046 Filed 3/29/18
Funding Request: 1899082199; 1899082154, 1899082259, 1899082264, respectively

Dear Mrs. Dortch,

Cochrane-Fountain City School District is requesting a Waiver of USAC's decision not to fund the above 471 application: "...USAC has received Cochrane-Fountain City School District's FCC Form 471 – 181042088 for Funding Year 2018 on 3/28/2018 and 471 – 181042046 on 3/29/2018, which was submitted out-of-window. Therefore, your application will not be considered for funding."

I. INTRODUCTION AND SUMMARY

Cochrane-Fountain City School District ("District") submitted and certified their Funding Year 2018 FCC Form 471 # 181042088 and 181042046, in the "Create FCC Form 471" section of the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company's ("USAC") EPC Portal, on March 28th, 2018, and March 29th, 2018 just 6 and 7 days, respectively, after the FCC Form 471 filing deadline of March 22, 2018. See attached acknowledgment pages from EPC.

II. REQUEST

Cochrane-Fountain City School District (District) respectfully petitions the Commission to request a waiver of the Funding Year 2018 FCC Form 471 filing deadline on behalf of the District to allow the Out of Window submission of their E-Rate Funding Year 2018 FCC Form 471s, due to:

In early January, it was brought to the attention of the school board of an alternative provider of bandwidth services. Thereupon, the District filed a new FCC Form 470 # 180019291. Subsequently, the District began the review and evaluation process; a proposal that would greatly increase the District's broadband at a considerable monthly cost savings. However, this would require the early termination of their current contract with significant termination penalties. At the February School Board meeting, additional information was requested of the prospective service provider. A motion was presented to the school board on March 21, 2018 and passed that same evening. This motion directed the Administration to engage in discussions leading to Cochrane Coop Telephone Company becoming the District's broadband provider. Unfortunately, the timing of this action did not provide the Administration ample time to prepare and file their 471 applications in a timely manner.

Respectfully submitted,

For the Applicant,



David Gornstein

Consultant

dave.erfs@att.net

Attachments:

2018 471 Certified - Cicgrabe

03.21.18 Cochrane SD Reg Mtg Broadband Motion

03.26.18 Notice of Passed Motion